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State of Ohio Environmental Protection Agency

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Bob Taft, Governor
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July 10, 2002

Mr. Johnny Reising
USDOE FEMP
P.O. Box 538705
Cincinnati, OH 45253-8705

C-1520

RE: DISAPPROVAL - WASTE PIT 4 CAP EXCAVATION IMPLEMENTATION PLAN

Dear Mr. Reising,

Ohio EPA has reviewed DOE's June 18, 2002 submittal, "The Draft Waste Pits Remedial Action Project Waste Pit 4 Cap Excavation Implementation Plan." Based upon our review, Ohio EPA disapproves this plan.

The actions proposed in this plan are unacceptable due to their inconsistency with the Operable Unit 1 Record of Decision, which clearly directs that waste pit cap materials will be disposed of at an off-site disposal facility. Such a change in disposal location, considering the extent to which the "balanced approach" involved decision making for the entirety of the site, would constitute a fundamental change to the Operable Unit 1 Record of Decision thus necessitating the completion of a ROD Amendment.

Additionally, the document is inadequate in a number of respects with regard to: a) characterization of the materials proposed for disposal in the OSDF, b) documented process knowledge regarding cap installation, c) differentiation between debris fill and "clean fill" used in cap construction, and d) justification that the cap contents will never be needed for any type of blending/processing of other pit wastes.

If you have any questions, please contact me at (937) 285-6466.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversightcc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Mark Shupe, HSI GeoTransMary C Wojciechowski, Tetra Tech EM Inc.
Ruth Vandergrift, ODH

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